

1 THOMAS E. FRANKOVICH (State Bar #074414)
 2 THOMAS E. FRANKOVICH
 3 **A PROFESSIONAL LAW CORPORATION**
 4 4328 Redwood Hwy, Suite 300
 San Rafael, CA 94903
 Telephone: 415/674-8600
 Facsimile: 415/674-9900

E-Filed 5/20/10

5 Attorneys for Plaintiffs
 6 CRAIG YATES
 7 and DISABILITY RIGHTS
 ENFORCEMENT, EDUCATION,
 8 SERVICES: HELPING YOU
 HELP OTHERS

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

11 CRAIG YATES, an individual; and)
 12 DISABILITY RIGHTS, ENFORCEMENT,)
 13 EDUCATION, SERVICES: HELPING)
 YOU HELP OTHERS, a California public)
 benefit corporation,)

CASE NO. CV-09-2057-RS

STIPULATION OF DISMISSAL AND
~~PROPOSED~~ ORDER THEREON
 JS

14 Plaintiffs,)

15 v.)

16 RICCARDO'S RISTORANTE E)
 17 PIZZERIA; CONSIGLIA CRISPI;)
 RICHARD CRISPI; and ALILAM, LLC,)

18 Defendants.)

19
 20 The parties, by and through their respective counsel, stipulate to dismissal of this action in
 21 its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(1). Outside of the terms of the
 22 Settlement Agreement and General Release ("Agreement") herein, each party is to bear its own
 23 costs and attorneys' fees. The parties further consent to and request that the Court retain
 24 jurisdiction over enforcement of the Agreement. See Kokonen v. Guardian Life Ins. Co., 511 U.S.
 25 375 (1994) (empowering the district courts to retain jurisdiction over enforcement of settlement
 26 agreements).

27 ///

28 ///

1 Therefore, IT IS HEREBY STIPULATED by and between parties to this action through
2 their designated counsel that the above-captioned action be and hereby is dismissed with prejudice
3 pursuant to Federal Rules of Civil Procedure section 41(a)(1).

4 This stipulation may be executed in counterparts, all of which together shall constitute one
5 original document.


6
7 Dated: April 26, 2010

THOMAS E. FRANKOVICH, Esq.
A PROFESSIONAL LAW CORPORATION

8
9 By: /s/Thomas E. Frankovich
Thomas E. Frankovich
10 Attorneys for CRAIG YATES and
11 DISABILITY RIGHTS ENFORCEMENT,
12 EDUCATION SERVICES:HELPING YOU HELP
OTHERS

13 Dated: May 13, 2010

NATASHA GORDON, Esq.
THE CRONIN LAW GROUP

14
15 By: 
16 NATASHA GORDON
17 Attorneys for Defendant ALILAM, LLC

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Dated: _____, 2010

ANDREW DIMITRIOU Esq.
DIMITRIOU & ASSOCIATES, P.C.

2
3
4 By: 


Andrew Dimitriou

Attorneys for Defendants CONSIGLIA CRISPI and
RICHARD CRISPI

7 **ORDER**

8 **IT IS HEREBY ORDERED** that this matter is dismissed with prejudice pursuant to
9 Fed.R.Civ.P.41(a)(1). **IT IS FURTHER ORDERED** that the Court shall retain jurisdiction for the
10 purpose of enforcing the parties' Settlement Agreement and General Release should such
11 enforcement be necessary,
12
13

14 Dated: 5/20/, 2010

15 
16 Honorable Richard Seeborg
17 United State District Judge
18
19
20
21
22
23
24
25
26
27
28